

**IN UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

ZACHARY FORT, NEW MEXICO SHOOTING	:	
SPORTS ASSOCIATION, FIREARMS POLICY	:	
COALITION, INC., and SECOND AMENDMENT	:	
FOUNDATION,	:	
<i>Plaintiffs,</i>	:	Civil Action No.
	:	
v.	:	
	:	
	:	
MICHELLE LUJAN GRISHAM, individually and	:	
in her official capacity as the Governor of New	:	<b><u>DECLARATION OF ALAN</u></b>
Mexico, PATRICK M. ALLEN, individually and in	:	<b><u>GOTTLIEB IN SUPPORT OF</u></b>
his official capacity as the Cabinet Secretary for the	:	<b><u>PLAINTIFFS' MOTION FOR A</u></b>
New Mexico Department of Health; JASON R.	:	<b><u>TEMPORARY RESTRAINING</u></b>
BOWIE, individually and in his official capacity as	:	<b><u>ORDER AND PRELIMINARY</u></b>
the Cabinet Secretary of the New Mexico	:	<b><u>INJUNCTION</u></b>
Department of Public Safety, and W. TROY	:	
WEISLER, individually and in his official capacity	:	
as the Chief of the New Mexico State Police,	:	
<i>Defendants.</i>	:	

I, Alan Gottlieb, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following statements are true and correct to the best of my knowledge:

1. I am over 18 years of age, competent to testify, and have personal knowledge of the matters stated herein. I make this declaration in support of plaintiffs' emergency motion for a temporary restraining order and preliminary injunction.
2. I am the Executive Vice President of the Second Amendment Foundation ("SAF") which I founded in 1974.
3. SAF is a nonprofit educational foundation incorporated in 1974 under the laws of Washington with its principal place of business in Bellevue, Washington. SAF is a 501(c)(3) organization under Title 26 of the United States Code.

4. SAF's mission is to preserve the individual constitutional right to keep and bear arms through public education, judicial, historical, and economic research, publishing, and legal-action programs focused on the civil right guaranteed by the Second Amendment to the United States Constitution.

5. SAF has more than 720,000 members nationwide, including in the State of New Mexico, including Zachary Fort.

6. SAF has filed this lawsuit on behalf of its members, including Fort, whose rights to carry firearms in public for lawful purposes are being abridged by the unconstitutional emergency declarations and orders challenged here.

DATED this 11th day of September, 2023.

  
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Alan Gottlieb  
Executive Vice President  
Second Amendment Foundation